

Sanction Process for Community Long Term Care (CLTC) Environmental Modification Providers

Community Long Term Care (CLTC) will review provider compliance with environmental modification program requirements on an ongoing basis. Reviews will be completed by the department's environmental modification specialist. Failure to comply with the environmental modification requirements will result in the application of sanctions, either suspension and/or termination.

Suspension: The environmental modification provider is removed from the provider choice list. The provider will not be allowed to bid or be listed on the participant's choice list for the duration of the sanction. The minimum period of suspension is 1 month. Providers who are suspended must complete all outstanding jobs to the specifications indicated by the environmental modification specialist before being allowed to perform new work with CLTC.

Termination: The cancellation of your enrollment in the Medicaid (CLTC) program resulting in denial of Medicaid participation for a period of three (3) years. After two suspensions for any reason, a third suspension in a two (2) year period from July-June will lead to termination from Medicaid participation.

Compliance Issues Resulting in Suspension and/or Termination

Refusing to complete jobs that the provider has bid on and won: Providers are expected to complete any job where they are the winning bidder. If the winning bidder **accepts the job, then** refuses to complete the project the provider will be subject to the following sanctioning process.

First offense - Suspend one (1) month

Second offense- Suspend two (2) months (within 1 year of first offense)

Third offense Termination (within 1 year of first offense)

Example: The provider bids and accepts jobs in several different areas, gets to the jobsite and decides he has underbid the project and/or doesn't have the time or manpower to complete the job and refuses to honor his bid. This action will result in sanctioning of the provider.

Failure to complete jobs timely as defined by the date on the environmental modification specialists bid notification in Phoenix: Providers are expected to complete work in a timely manner. If it is identified that there are three (3) occurrences of this type within a six (6) Month time period of January thru June and/or July thru December the following sanctions will apply.

- A) Suspension for two (2) months
- B) Each subsequent occurrence- Suspension for two (2) months

Example: The provider accepts a project through Phoenix which has an expected date of completion on it; if the provider accepts the job he is accepting the completion time frame. If the environmental modification specialist discovers that the provider is not completing this project in the allotted time frame indicated on the bid in Phoenix this action will result in sanctioning of the provider indicated above.

SCDHHS environmental modification Inspector returning to jobsite due to poor workmanship:

Providers are expected to comply with the standards set forth by the environmental modification inspector. If the SCDHHS inspector must return to the jobsite due to poor workmanship the following sanctioning process will occur.

- A) Three (3) substantiated returns in any quarter - Suspend two (2) months
- B) Six (6) substantiated returns in any quarter - Terminate

Example: The provider accepts a project through Phoenix and completes the job. The environmental modification specialist will then review the work that was done. If the environmental modification specialist determines that the project was not done to general contracting standards a letter will be sent to the provider indicating the corrections that need to be completed on the job. If this occurs sanctioning of the provider will occur on the schedule mentioned above.

Documenting in Phoenix **that a job is complete and/or** billing for services through Care Call prior to completion of job: Providers cannot bill Medicaid prior to the completion of an environmental modification project. If providers are found to have billed Medicaid or documented in Phoenix that the job was completed prior to job completion the following sanctioning process will apply:

- Recoupment of inappropriate payment, if found job is not completed plus
- A) First offense – Suspend for one (1) month
- B) Second offense – Suspend two (2) months
- C) Third offense- Termination

Example: The provider accepts a project through Phoenix and goes to work on the job. The provider is told by his crew that they have completed the job and the provider indicates this in the Phoenix system and/or bills for the job through Care Call. The environmental modification specialist and/or participant determine that project was not complete prior to indicating it in phoenix and/or billing through Care Call will result in the sanctioning of the provider on the schedule mentioned above.

Refusal or inability to complete job to the specifications set forth by the Environmental Modification inspector: Providers are expected to complete jobs within the standards set forth by the environmental modification specialist. Any job not completed to general contracting specifications will receive a corrective action letter that must be followed. If the provider does not follow the corrective action letter and the deficiencies are not corrected within two (2) weeks all funds will be recouped and the provider will be automatically suspended from providing services to Medicaid participants until the job has been completed. The provider will be reinstated one month after the date of completion of the job.

A second offense of the type described above will result in being suspended for two months after the correction of the deficiencies and a third offense will result in automatic termination as a Medicaid provider.

Example: The provider accepts a project through Phoenix and completes the job. The environmental modification specialist will then review the work that was done. If the environmental modification specialist determines that the project was not done to general contracting standards a letter will be sent to the provider indicating the corrections that need to be completed on the job. If the provider does not correct the deficiencies within two weeks this will lead to the sanctioning process mentioned above.